

REMARKS

Claims 1-26 remain pending in this application. Claims 2-6, 8, 11-13, and 16 now stand allowed for which applicants extend their thanks to the examiner. Claims 1, 14, 15, and 26 stand Finally Rejected, whereas claims 7, 9, 10, and 21 stand objected to as depending from a rejected base claim, but would be allowable if re-written in independent form. Applicants have amended claims 1 and 15 to better distinguish their invention over the art of record and place the application in better condition for consideration. As discussed hereinafter claims 1 and 15 patentably distinguish over the art of record, rendering those claims, and the claims that depend therefrom patentable. Applicants respectfully request reconsideration of the rejection of these claims.

35 U.S.C. § 102(b) Rejection of Claims 1 and 15

Claims 1 and 15 stand rejected under 35 U.S.C. 102(b) as anticipated by EP062000, corresponding to WO93/14591, in the name of Robert Farber. Applicants respectfully traverse the rejection in view of the amendments to claims 1 and 15.

The Farber patent concerns a technique for adding film grain to video image produced by a progressive scan video camera (110). The analog video image produced by the camera (110) undergoes conversion into a digital signal by an A/D converter (116). A summing amplifier (122) sums the digitized video signal with white noise generated by a grain simulator to produce a video signal having simulated film grain.

Applicants' amended claims 1 and 15 now recite the feature of characterizing film grain in accordance with the difference between the input image stream and a filtered input image stream. The Farber reference does not teach this feature of newly amended claims 1 and 15, and the claims that depend therefrom. Farber does not characterize the film grain in an input image stream (i.e., the output of the imager 106), let alone perform such characterization in accordance with the difference between the input image stream and a filtered input image stream. Indeed, Farber makes no characterization of the film grain in an image stream at all.

At best, Farber provides a gray scale modifier (124) which adjusts the amount of film grain already added to the image based on the video level so that the grayscale will appear non-

linear to better mimic the look of actual film. However, modifying the grain already present in the image, as taught by Faber certainly does not constitute the same step as characterizing the film grain in the input image, let alone performing such characterization in accordance with the difference between the input image stream and a filtered input image stream, as recited in applicants' amended claims 1 and 15.

In summary, Faber does not teach or suggest all of the features of applicants' amended claims 1 and 15. Accordingly, applicants request withdrawal of the 35 U.S.C. § 102(b) rejection of these claims.

Claims 7 and 9-10 depend from claim 1 whereas claim 21 depends from claim 15. Dependent claims 7, 9-10 and 21 thus incorporate by reference all of the features of their respective independent base claim. Therefore 7, 9-10, and 21 patentably distinguish over the art of record for the same reasons as advanced for claims 1 and 15, respectively.

35 U.S.C. § 103(a) Rejection of Claims 14 and 26

Claims 14 and 26 stand rejected under 35 U.S.C. § 103(a) as obvious in view of EP062000, corresponding to WO93/14591, in the name of Robert Farber. Applicants traverse this rejection.

Claims 14 and 26 depend from claims 1 and 15, respectively, and incorporate by reference all of the features of their respective parent claim. Thus, claims 14 and 26 incorporate by reference applicants' feature of characterizing the film grain in an input image stream in accordance with the difference between the input image stream and a filtered input image stream. As discussed above with respect to the 35 U.S.C. § 102(b) rejection of claims 1 and 15, Faber simply does not teach this feature. Therefore, Faber would not render obvious claims 14 and 26. For this reason, applicants request withdrawal of the 35 U.S.C. § 103(a) rejection of these claims.

Conclusion

In view of the foregoing, applicants solicit entry of this amendment and allowance of the claims. If the Examiner cannot take such action, the Examiner should contact the applicant's

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attorney at (609) 734-6820 to arrange a mutually convenient date and time for a telephonic interview.

No fees are believed due with regard to this Amendment. Please charge any fee or credit any overpayment to Deposit Account No. **07-0832**.

Respectfully submitted,

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